

# Our Local Plan



Housing and Economic Land  
Availability Assessment

October 2016

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# 1. Introduction

## Background

- 1.1 The Housing and Economic Land Availability Assessment (HELAA) is a technical study that determines the suitability, availability and achievability of land for development. It is an important evidence document that informs plan-making, but it does not in itself represent policy nor does it determine whether a site should be allocated for development in the future. Land allocations can only be made by local authorities through a Development Plan Document, such as a Local Plan.
- 1.2 The process was formerly known as the Strategic Housing Land Availability Assessment (SHLAA) but was renamed as the HELAA to reflect its ability to assess land for other uses other than housing. In 2015, the Council published its first HELAA Report to inform the Local Plan: Issues and Approaches document, which was released for consultation between the 18<sup>th</sup> December 2015 and 26<sup>th</sup> February 2016.
- 1.3 The HELAA report has followed the methodology that was approved at Planning Policy Committee in March 2015 for undertaking the process.

## What is included in this Report?

- 1.4 This HELAA builds upon and updates the 2015 Report. It has assessed the development potential of sites submitted to the Council through the HELAA process. The report presents the following key outputs:
  - Details, including maps, of sites submitted as part of the HELAA process;
  - An assessment of the suitability of each site for development;
  - A notional development capacity that could be delivered on each site assessed to be suitable;
  - A calculation of the potential windfall delivery of housing for the district<sup>1</sup>; and
  - An indicative trajectory of development that could come forward.

## What the HELAA does and what it does not do

- 1.5 Whilst the HELAA is a key document, it is only one part of the evidence base used to inform the preparation of the Local Plan. It is important to understand what the HELAA does and does not do. This is presented in Table 1, below.

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<sup>1</sup> Windfall delivery relates to the delivery of housing which will come forward on unidentified sites or on sites that fall below the minimum HELAA threshold within the plan period.

**Table 1: Table showing summary of what the HELAA does and does not do**

<b>What it is</b>	<b>What it is not</b>
A document that informs Local Plan preparation	A process that directly allocates land for development
A process for assessing any sites submitted to the Council for consideration as a future allocation	A document that excludes the consideration of land in the Green Belt
A document that provides the Council with a general understanding of the development potential of sites	A document that grants planning permission for sites or suggests that planning permission would be granted
A process that allows a windfall allowance to be calculated	

## 2. Policy Context

### National Policy and Guidance

- 2.1 The National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guidance (PPG) identifies that the Government wants to use the planning system to significantly boost the supply of housing<sup>2</sup> and support sustainable economic growth<sup>3</sup>. Assessing the development needs of the district and identifying specific and deliverable sites in order to facilitate this is a critical aspect of the Local Plan process.
- 2.2 Specifically, the requirement for Local Authorities to produce a land assessment which enables realistic assumptions about the availability, suitability and achievability of land to meet identified development needs for the duration of the plan period is set out in paragraphs 159 and 161 of the NPPF. The NPPF identifies the advantages of carrying out land assessments for housing and economic development in tandem, to ensure that sites can be considered for the most appropriate use.
- 2.3 The PPG provides advice on how to undertake HELAAs. Simply put, the advice states that a HELAA should:
- Identify sites and broad locations with potential for development;
  - Assess their development potential and suitability; and
  - Assess the likelihood of development coming forward (availability and achievability).
- 2.4 Such advice was taken on board when finalising the Tandridge HELAA methodology and undertaking the site assessments.

### Local Policy

- 2.5 Tandridge District Council's local planning policies are set out in the Core Strategy (adopted in 2008) and the Detailed Policies Document (adopted in 2014). These documents continue to be used in determining planning applications.
- 2.6 The Council is preparing a Local Plan which will replace the Core Strategy and will be using its evidence base, including this HELAA and subsequent reviews, to inform the Local Plan's preparation. As such, sites assessed as part of the HELAA process are done in a 'policy-off' manner in that they are not judged in detail against current local planning policies the way a planning application would be, although regard may be had to current policies to provide appropriate context. Instead the sites are assessed against an agreed framework.

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<sup>2</sup> NPPF, Paragraph 47

<sup>3</sup> NPPF, Paragraph 19

- 2.7 The only exception to this is when assessing site achievability where the current financial requirements of Community Infrastructure Levy and S106 contributions are used to broadly assess financial viability.



## 3. Methodology

### Establishing a Methodology

- 3.1 The first part of the process was the establishment of an agreed methodology for undertaking the HELAA. An initial draft methodology was produced (at that point under the title of 'draft SHLAA methodology'), and was developed taking into account national policy and advice contained in the NPPF and PPG. The draft methodology was approved for consultation at Planning Policy Committee on 11<sup>th</sup> December 2014.
- 3.2 The consultation on the draft methodology took place between 19<sup>th</sup> December 2014 and 30<sup>th</sup> January 2015, during which views were sought from a range of stakeholders that included neighbouring authorities, developers and local groups.
- 3.3 In total, 25 consultation responses were received on the draft methodology and were taken into account when amending the document. After changes were made to the methodology (including a name change of the process from SHLAA to HELAA), it was adopted on 19<sup>th</sup> March 2015 at Planning Policy Committee.

### The Process

- 3.4 The adopted methodology sets out a 5 stage approach, based on the approach identified in the PPG, for undertaking the Tandridge HELAA, as set out below:
1. Site identification;
  2. Site assessment;
  3. Windfall assessment;
  4. Assessment review; and
  5. Final evidence base.
- 3.5 The above approach has been followed and the various stages have been addressed in the subsequent sections of this report.

### Types of sites

- 3.6 Unlike a SHLAA, which only assesses land that could deliver housing, this HELAA considers sites for housing, employment or traveller uses. Accordingly, the subsequent sections of the HELAA relate to sites capable of accommodating the different types of land uses. If a site is considered capable of accommodating a mix of uses, generally it is assessed within the housing sites section.

## 4. Potential Housing Sites

### Background

- 4.1 A major reason for undertaking the HELAA process is to ensure that a variety of potential housing sites are assessed to allow different options for future development to be considered when preparing a Local Plan.

### Site Identification

- 4.2 Before identifying sites to assess through the HELAA process, the Council has determined that the extent of the assessment area should be the entire district. This approach allows the Council to consider a much larger number of sites from the outset and accords with the methodology set out in the PPG. The Council will keep this under review as the preparation of the Local Plan progresses in terms of relevant evidence based studies which may be relevant to the site assessment process, and with regard to the development strategy which the Local Plan will set.
- 4.3 To ensure as many sites as possible could be considered through the process, sites assessed as part of the HELAA were identified from multiple sources, which included the following:
- Sites included in the former SHLAA process – There were a number of sites that were submitted for assessment in the original SHLAA (published 2011) that had never been developed and it was seen appropriate to be considered;
  - Sites under the Council's own assets as identified through an ongoing corporate review of the Council's assets; and
  - Sites identified through the pre-application advice service or where planning permissions had lapsed or been refused but might be granted in future.

### Call for Sites

- 4.4 In addition to the above the Council undertook two 'Calls for sites' exercises to inform the 2015 HELAA. This involved inviting landowners and agents to use a HELAA site submission form to submit sites for the Council to assess. The initial call for sites ran between 19<sup>th</sup> December 2014 and 6<sup>th</sup> February 2015 and an additional call was carried out between 23<sup>rd</sup> March 2015 and 10<sup>th</sup> April 2015, following the revision and adoption of the updated HELAA Methodology. The majority of the HELAA sites were identified in this manner.
- 4.5 The HELAA site submission form remained on the Council's website and additional sites were submitted to the Council between 10<sup>th</sup> April 2015 and 4<sup>th</sup> March 2016, many of which were received during the Council's first formal consultation on the Local Plan which took place between December 2015 and February 2016. These sites have been assessed in this HELAA Report.

## Site Assessments

- 4.6 Information used in the assessment of sites was gathered from a variety of 'desktop' sources that included:
- The Council's in house GIS data which includes information on flooding, historic assets, landscape and environmental designations and other relevant information;
  - The site promoter's site submission form;
  - Meetings between Council officers and site promoter's, where they took place<sup>4</sup>; and
  - Relevant planning applications.
- 4.7 Regard was also had to information contained in representations on the Local Plan – Issues and Approaches document that related to HELAA sites, as well as any supplementary information that site promoters may have provided the Council.
- 4.8 In addition, sites assessed were visited by Planning Policy Officers to verify information gathered through the 'desktop' process. Site visits also enabled Officers to establish whether there were any additional uses and/or constraints present on the site which had not been identified through the desktop phase.
- 4.9 In most cases site visits were unaccompanied but occasionally, either for safety or access reasons, Officers were accompanied by site promoters and/or landowners. The information from the desktop sources and the site visits was recorded in a database.

### Assessing the suitability of sites

- 4.10 Suitability is a high level assumption about whether a site could be developed, not whether a site should or will be developed or allocated. The suitability of a site is one, albeit crucial, aspect of the HELAA assessment. Determining a site's suitability is done by taking into account information available to the Council to help build up a picture and general understanding of the site area in relation to its development potential.
- 4.11 When assessing the suitability of sites, consideration was given to all sites submitted and only where no feasible development potential could be demonstrated were sites deemed to be unsuitable. This may be due to certain constraints that currently exist, for example flooding, where no information

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<sup>4</sup> In accordance with the Council's HELAA methodology, a number of meetings between Council officers and site promoter's, landowners and developers took place during April to May 2016. These focussed on sites which had been identified as being suitable and available at that time and gave the Council the opportunity to clarify information which was then considered when preparing the HELAA 2016.

was provided to show how the constraints could be overcome. As such, unsuitable sites will remain in the HELAA process and will be reassessed for their suitability where further information becomes available.

- 4.12 Also considered when assessing suitability were physical problems or limitations of the site or immediate surroundings. These included, but were not limited to, the following:
- Whether the site could be accessed;
  - Whether topography or ground conditions would prevent development;
  - Locational suitability; and.
  - Whether a site was a suitable size or could deliver an appropriate yield.
- 4.13 In determining locational suitability, a judgement was made that if a site was not within or immediately adjacent to a sustainable settlement, then it would not be a suitable location for development at this point in time. The exception to this was if a HELAA site, when combined with another HELAA site, would be adjacent to a sustainable settlement. In this context, the Tandridge District Settlement Hierarchy (2015) (as shown in Figure 1) was used to define whether a settlement was sustainable or not. If a site was adjacent to a settlement categorised as a limited or unserved, it was seen as being locationally unsuitable and would have been ruled out on such grounds.

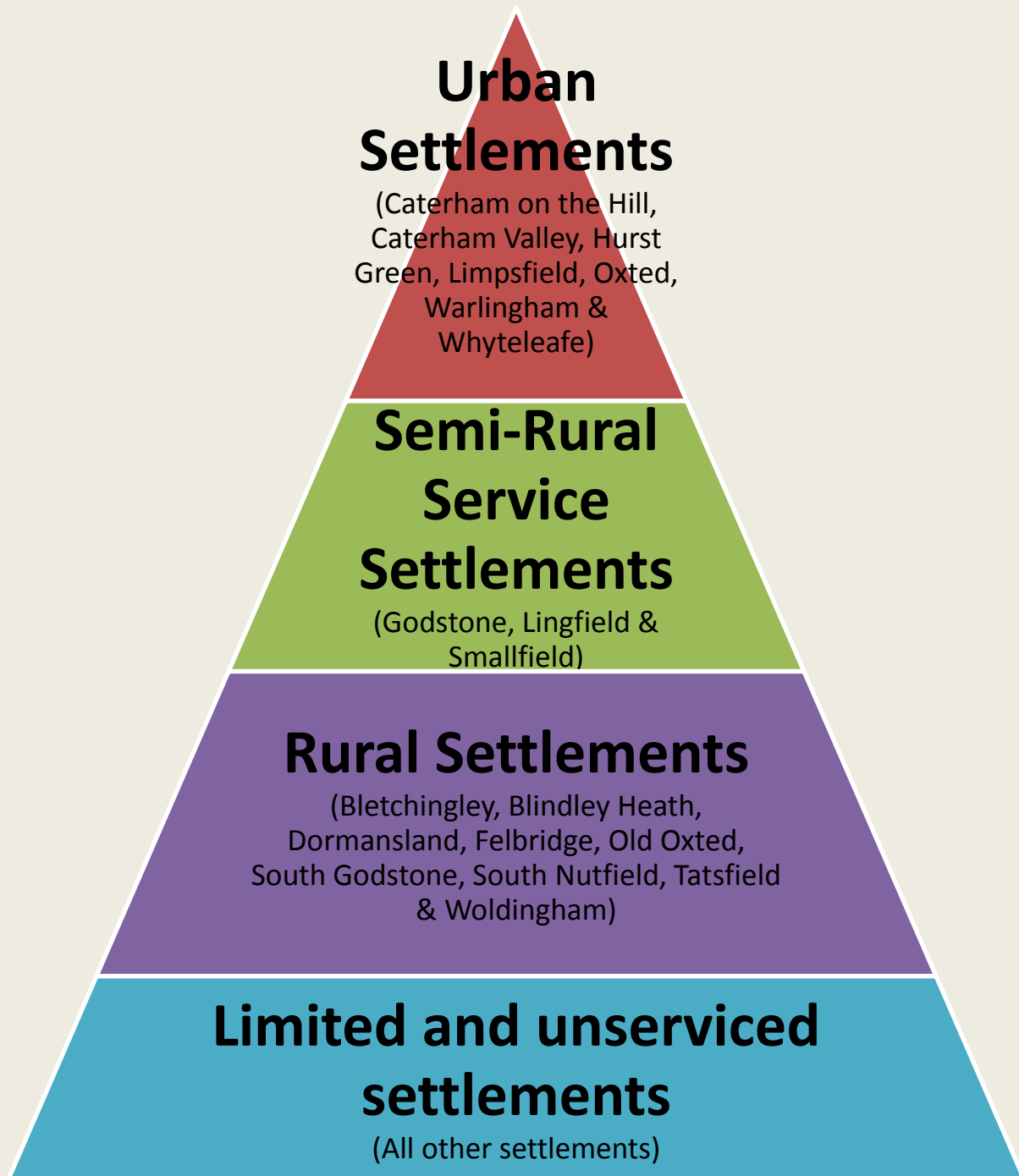


Figure 1: Tandridge District Settlement Hierarchy

4.14 If sites had no known constraints or limitations that would prevent development, then it was viewed as being suitable. It is important to note that existing policy constraints, such as the Green Belt, were not considered to prevent the site from being assessed to be suitable. In future reviews of the HELAA, the completion of other evidence documents and the setting of a settlement hierarchy could impose other constraints on site suitability. Future reviews of the HELAA will also consider whether sites are or can be serviced

by essential infrastructure, as outlined in the HELAA methodology<sup>5</sup>. It should be noted, however, that detailed information on infrastructure provision is unlikely to be determined until a preferred development strategy for the Local Plan is established, and the proposed locations and size of developments is known.

- 4.15 Finally, as part of the suitability assessment and in accordance with both the PPG and the adopted methodology, the HELAA only considers sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m<sup>2</sup> of floor space) and above. If it was apparent at the desktop stage that sites would not be able to satisfy these criteria, they would be considered 'non-qualifying' and no further consideration of them would take place. However, they have been kept on the file for the purposes of considering whether there is a potential supply of windfall development, and in case site sizes or circumstances change when the HELAA is reviewed in the future.

#### Assessing the availability of sites

- 4.16 Availability is important in the HELAA process as it helps to establish whether a site is a valid option for consideration and relates to a landowner's willingness to see a site developed. Given the role of the HELAA in enabling the Council to establish a land supply for future development, if there is an element of doubt over whether a site will come forward or that certain constraints prevent it from being considered available (e.g. current long term occupation or a lack of commitment from all landowners where multiple parties are involved), then it cannot realistically be included as a potential option.
- 4.17 In addition, attention was given to the following questions in ascertaining whether the site could be judged as being available:
- Is there a willing land owner?
  - Are there multiple owners/ransom strips?
  - Is the site available now?
  - Is the site likely to be available in 10 years' time?
  - Are there any legal or ownership problems?
  - What is preventing the site from being available and what measures could be taken to address this?
- 4.18 To assist in determining the availability of sites and to confirm that key information, such as site boundaries, were correct, a 'fact checking' exercise was conducted as part of the 2015 HELAA Report. This exercise was particularly important for sites that had been carried into the HELAA from the

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<sup>5</sup> Paragraph 4.13 of the HELAA Methodology (2015)

original SHLAA without a HELAA site submission form. Consequently, a number of sites were found to be unavailable as no confirmation for their continued inclusion in the assessment process was received.

- 4.19 No 'fact checking' exercise was taken to inform this report, but where informed of changes to the availability of sites by landowners or agents, this has been reflected in our findings. Sites which have been found unavailable will remain in the HELAA process but will not be seen as potential options for the allocation of land or be able to contribute to potential land supply. Should the Council receive information that the availability of sites has altered, this will be reflected in subsequent HELAA Reports.

#### Assessing the achievability of sites

- 4.20 Section 3, Paragraph 21<sup>6</sup> of the PPG explains that a "... site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time." It continues by explaining that it "... is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period."
- 4.21 Assessing achievability requires a specialist knowledge and understanding of the market factors, cost issues and delivery of development which is key to understanding and considering the development potential of a piece of land. To secure this knowledge, the Council commissioned BNP Paribas to carry out a high level and independent assessment of site viability, using a sample of sites being considered through the 2015 HELAA process. This work is included as Appendix 2 to this Report and was done in liaison with a selection of development professionals and Council officers who are familiar with developing in the district and who have an understanding of the local housing market. This ensured that the variables used in site testing were appropriate for the local context.
- 4.22 A key output of this study was to raise awareness of the elements that may be a factor in identifying viable and deliverable sites through the plan-making process and the barriers which the Council may need to consider when refining development options and drafting policies. The study represented the first stage in the assessment of site viability and reflects information gathered at that point in time. Whilst viability appraisals were carried out for certain sites, it would be inappropriate to use these for any commercial valuation purpose, since the viability models were designed as a tool to broadly test policy, as opposed to being formal valuations of planning application sites. None of the information set out in the document will be used to determine

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<sup>6</sup> Reference ID 3-021-20140306

planning applications and has been carried out to assist with plan-making only.

- 4.23 Overall, the findings of the study suggested that the majority of the sites that were tested for their achievability generated sufficient residual land values to be considered viable at this time. However, some sites tested were found unviable due to market factors, rather than the impact of the Council's policy requirements on matters such as affordable housing and indicate that a change in market conditions would be needed in order to improve viability. The report also suggested that affordable housing thresholds and a variation of densities, where appropriate, could be ways to overcome issues with viability and as a result, this will need to be a consideration for the Council as the Local Plan progresses.
- 4.24 The Council has not used the findings of the BNP Paribas study to rule any site to be unachievable. Instead, it is felt that the report supports the need for further communication between developers and the Council in order to explore the site specific factors which would not be evident in a high level viability assessment of sites. Such information may include commercially sensitive or confidential agreements and options on land which may mean financial viability is more secure but not immediately apparent to the Council.
- 4.25 As the Local Plan progresses towards a preferred development strategy and as more information on individual HELAA sites becomes known to the Council, further work on site viability will be necessary. Such work will play a role in demonstrating that the Local Plan's preferred strategy can be achieved.

### **Estimating Site Capacity**

- 4.26 Calculating the approximate potential capacity of a site is a key aspect of the HELAA. This allows the Council to understand the development potential of sites.

#### Developable Areas

- 4.27 In order to arrive at a site capacity, it is important to establish the developable area as this is not always the same as the site area submitted. To this effect Officers mapped out the extent of the developable areas of sites and this is reflected in each of the site assessments.
- 4.28 The developable areas were established based on a number of factors. This included, but is not limited to, the following:
- Ancient woodland (and 15m buffer);



- Undeveloped land in Flood Zone 3<sup>7</sup>;
- Areas of Outstanding Natural Beauty (AONB) (as well as areas recognised as candidates for AONB extension); and
- Sites allocated for Minerals and Waste use.

4.29 Furthermore, in some instances there were other site specific reasons for reducing developable areas. This included issues such as the topography of the land, potential land contamination or any other demonstrable obstacles that would inhibit development on a particular site.

### Potential yield

4.30 Yield relates to the net amount of housing that could be delivered on a particular site. When considering yields, consideration was given to developable areas of sites, potential housing densities and estimates of site capacity provided by site promoters<sup>8</sup>. Regard was also had to detailed work undertaken on sites that had been assessed as part of the previous SHLAA process and any planning applications, where applicable.

4.31 The 2015 Report provided estimates on every site identified as being deliverable or developable. For this HELAA report, site yields for each site were reassessed in order to reflect up to date information on sites as well as redrawn developable areas. Thus in many instances yields for sites have changed.

### **Site Categorisation**

4.32 The determination of a site's suitability, availability and achievability combined with timeframe for development, directly informs the overall site assessment as either:

- Deliverable,
- Developable, or
- Non-developable

4.33 The NPPF explains in footnote 11 to Paragraph 47 that for a site to be considered deliverable, it "should be available now, offer a suitable location development now, and be achievable with a realistic prospect that development will be delivered on site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years".

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<sup>7</sup> Land at risk of flooding at least every 1 in 20 years

<sup>8</sup> Site submissions for the HELAA were made by both planning professionals and general members of the public. Furthermore the potential capacity of a site was not always identified in a submission form and in other cases a range was submitted. As such a consistent consideration of capacity had to take place that sometimes meant a promoter's estimate was not used.

- 4.34 Paragraph 47 continues in footnote 12 by explaining that for a site to be considered developable, it “should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. A developable site is Suitable, Available and Achievable and has timeframe for development of 5-10 years or 10+ years”.
- 4.35 In order to ensure that we abide by the above guidance, we have classified suitable, available and achievable sites as either being deliverable or developable. This is explained in the sub-headings below.

#### Deliverable

- 4.36 For the purposes of this report, sites that have been assessed to be suitable, available and achievable and located outside of the Green Belt boundary have been classified as deliverable, unless we had specific information to suggest that the site could not come forward within 5 years. This is because the existing development plan would generally support development at such locations.
- 4.37 In summary, 15 sites were considered to be deliverable, capable of bringing forward 479 dwellings. As with the developable sites, maps and site assessment information for sites considered to be deliverable can be found in Appendix 3.

#### Developable

- 4.38 For the purposes of this report, we have classified sites as being developable if they are either:
- Suitable, available and achievable sites that are located within a defined settlement boundary, but specific information suggests that development could not come forward within 5 years; or
  - Suitable, available and achievable sites that are located within the Green Belt boundary.
- 4.39 The reason for classifying sites located within the Green Belt boundary as developable is due to the fact that the HELAA assumes that such sites will, where justified, come forward through the plan-led system as allocations. Given that the Local Plan is not envisaged to come into effect until 2019, and that achieving planning permission and developing sites could take a significant time after sites are allocated in the Local Plan, we have assumed that completions on such sites would not be until the 2021-2022 monitoring year at the earliest. Accordingly, such sites would not have completions within 5 years and thus can only be classified as developable.
- 4.40 In summary, 89 sites were considered to be developable, capable of bringing forward 13,277 dwellings between 2021 and 2033. As with the deliverable

sites, maps and site assessment information for sites considered to be developable can be found in Appendix 3.

#### Non-Developable

- 4.41 A site is non-developable where the prospect of development is unlikely as it does not meet all three criteria of being suitable, available and achievable. As such, there are multiple reasons as to why a site would be considered non-developable. Lists of non-developable sites categorised as unavailable, unsuitable or non-qualifying can be found in Appendix 4.

#### **Future Updates**

- 4.42 As the HELAA is an iterative process, any future reviews will look at additional information available for the Council to consider, including any new sites which are submitted to the Council for assessment through the HELAA. Additionally, further consideration of potential yields and determination of net developable areas will be considered in future versions of the report and in liaison with site owners and/or their promoters.
- 4.43 Although the HELAA is published alongside other evidence base studies which collectively inform the Local Plan: Sites Consultation document, at the time of writing and compiling the HELAA, such studies had not been completed. As a result, the HELAA **does not** reflect studies, including the Green Belt Assessment (Part 2): Areas of Further Investigation, nor the Landscape Capacity and Sensitivity Study and Site-based Ecology Assessments.
- 4.44 Given that such additional information may be considered by the Council, **conclusions on the suitability, availability and achievability of sites can change, as can assumptions on whether sites are deliverable or developable.**

## 5. Potential Employment Sites

### Background

- 5.1 The Tandridge District Economic Needs Assessment (ENA) was undertaken on the Council's behalf by AECOM in 2015. It assessed a variety of sites across the district for their employment use.
- 5.2 The ENA identified that there was little need for any additional employment floorspace other than for B1 (office) use. Instead, it recommended that almost all sites identified in the ENA should be retained and/or intensified for employment uses.
- 5.3 Taking into account the recommendation to retain existing sites, the 2015 HELAA ruled that any ENA site that had been submitted by site promoters would be unsuitable for other uses such as housing. Furthermore, the Council did not consider any additional sites for their employment/economic potential at that time.
- 5.4 Since the 2015 HELAA report, the Council has commenced a more rigorous consideration of employment land in preparing this HELAA to understand whether sites identified in the ENA are available for retention and intensification. Where the availability or suitability of the ENA sites cannot be demonstrated, the Council will need to determine whether it is appropriate to identify new sites which can meet any employment needs, through the Local Plan.
- 5.5 Additionally, the Council has assessed ENA sites for housing (see section 4 of this report) where site promoters have submitted a HELAA form identifying that they wish to deliver housing on their site.

### Site Identification

- 5.6 The sites identified for inclusion in the HELAA for employment uses consists entirely of the 33 ENA sites. The HELAA would have considered other sites submitted to the Council for employment sites had any been made. Instead, the few HELAA submissions that did indicate that site promoters wanted their sites considered for employment allocations were already ENA sites.

### Site Assessments

#### Assessing the suitability and achievability of sites

- 5.7 The ENA provided a qualitative assessment of each of the 33 sites. Given that this assessment was based on criteria set by AECOM and agreed by the Council, the HELAA has not reassessed the sites' suitability and achievability and instead utilises the ENA's findings to determine suitability at this point in time and considers it to be a recent assessment. The Council is likely to reassess such sites in future HELAA updates.

- 5.8 The ENA identified that only 1 site (ENA 10 – Dickinson House) was not appropriate for employment use and could be released for other uses subject to all other relevant planning considerations. For the other sites, the ENA identified that they were all suitable for continued employment use and that some of the sites had potential for intensification and redevelopment. It should be remembered, however, that the HELAA is just one piece of evidence and any sites to be allocated in the Local Plan will be subject to a consideration of other evidence.

#### Assessing the availability of sites

- 5.9 To find out about a site's availability for retention and/or intensification, the Council undertook Land Registry searches and contacted landowners of ENA sites, asking them to respond to a survey. The survey asked landowners about their future intentions for their sites. A copy of the survey can be found in Appendix 5.
- 5.10 The Council determined that if a response to the survey was provided that indicated that they wanted to increase provision by redeveloping, intensifying or expanding their land then the site was deemed to be available.
- 5.11 If a response indicated that they would look to dispose, close down or to use the site for non-employment uses, then the HELAA classified such sites as not being available for expansion/intensification.
- 5.12 Similarly, if a response was received that stated that they wished to only retain their existing uses or if no response was received by landowners, the site was classified as not being available for expansion/intensification. In these instances, it would not prevent an existing site from continuing to function in its current form and no conclusions are drawn relating to current operations.
- 5.13 From the Land Registry searches and the responses to the survey, it is clear that a number of sites are in multiple ownership. This has been taken into account and in general, the availability of the site has been determined by the majority landowner of each site.

#### Estimating Site Capacity

- 5.14 At this stage the Council has not estimated the amount of additional floorspace each site could generate if they were expanded or intensified. Instead the hectareage of each site is identified. To establish this information, the Council would need to reflect on a wider evidence base such as landscape capacity, and will become known as the preparation of other evidence and the Local Plan continues.

## Findings

5.15 The findings of the assessment of each site are presented in Appendix 6 to this report. In total, 11 sites were considered available to be expanded or intensified to deliver additional employment floorspace.

## Future Updates

5.16 As the HELAA is an iterative process, any future reviews will look at additional information available for the Council to consider. This will include any additional sites submitted for assessment. Additionally, further consideration of site availability and capacity will be considered in future versions of the report and in liaison with site owners and/or their promoters.

5.17 Although the HELAA is published alongside other evidence base studies which collectively inform the Local Plan: Sites Consultation document, at the time of writing and compiling the HELAA, such studies had not been completed. As a result, the HELAA **does not** reflect studies, including the Green Belt Assessment (Part 2): Areas of Further Investigation, nor the Landscape Capacity and Sensitivity Study and Site-based Ecology Assessments.

5.18 Given that such additional information may be considered by the Council, **conclusions on the suitability, availability and achievability of sites can change.**

## 6. Potential Traveller Sites

### Background

- 6.1 Planning Policy for Traveller Sites (PPTS), as most recently amended in August 2015, sets out the Government's policies and expectations in relation to planning for the needs of Gypsies, Travellers and Travelling Showpeople (where relevant, collectively termed as 'travellers' in the remainder of this report).
- 6.2 The PPTS is clear that local planning authorities should identify accommodation need for travellers, set pitch and plot targets (for Gypsies/Travellers and Travelling Showpeople, respectively) in Local Plans and identify sites to meet such targets.
- 6.3 Tandridge's needs for traveller sites were assessed in the Traveller Accommodation Assessment (TAA) that was undertaken in 2013. It identified a need for 63 pitches and 26 plots between 2013 and 2028.
- 6.4 The Council, recognising that the changes to the PPTS will impact upon the way in which needs are calculated, have commissioned a new TAA which will inform the Local Plan.
- 6.5 The Local Plan will, among other factors, take into account the conclusions of the TAA and any subsequent updates when setting targets for pitches and plots. Meeting such targets may necessitate allocating sites for traveller provision.

### Site Identification

- 6.6 The Council is taking a proactive approach to identifying sites for assessment through the HELAA process and is primarily using two sources; sites submitted as part of a call for sites and sites where there is a current planning application for increased provision.

### Call for Sites

- 6.7 In early 2014, the Council undertook a specific call for sites asking for potential traveller sites to be submitted for consideration as part of a Traveller Sites Document that the Council were to prepare. Only a handful of sites were submitted as part of this process and the Council decided not to continue with a specific Traveller Site Document but to consider allocations as part of the Local Plan.
- 6.8 In late 2014 and early 2015, calls for traveller sites were repeated as part of the wider HELAA process. In total, there were 9 sites submitted for assessment and such sites were assessed in the 2015 HELAA. An additional site was submitted to the Council for the 2016 HELAA.

## Live Planning Applications

6.9 As well as considering sites submitted specifically to the Council for assessment in the HELAA, the Council also considered it appropriate to assess sites where a planning application has been lodged for additional traveller accommodation. **It is important to note that the judgement reached when assessing such sites through the HELAA process has no impact on the consideration of the live planning applications.**

## Site Assessments

6.10 To ensure that the assessments of sites were undertaken in a consistent manner, a template was developed. This is shown in Table 2, below. In developing the template, regard was had to relevant policies in the plan-making section of the PPTS.

Table 2: Table showing template for assessing potential Traveller sites

1. Site Characteristics	
Aspect	Information to note
Location	Address
Current Land Use	Whether the site is greenfield/brownfield. If brownfield, what use is it and whether it is vacant or occupied.
Size	Hectarage and amount of plots/pitches that could be accommodated
Topography	Whether the site is level enough for traveller accommodation.
Availability	Whether the site has been made available for traveller use.
2. Environmental	
Aspect	Information to note
Flood Risk	Which flood risk zone(s) the site is located within. Whether there are known to be other sources of flooding (groundwater, drainage, etc.)
Environmental Health	Whether there is potential land contamination, noise or air quality issues associated with the site.
Environmental Designations	Whether the site lies in or adjacent to SSSIs, LNRs, ancient woodland, etc.
Landscape Designation	Whether the site lies in the AONB etc.
Green Belt	Whether the site lies within the Green Belt.
3. Social	
Aspect	Information to note
Accessibility/ Proximity to services	Whether the site benefits from access to services such as schools, doctors, shops, etc.
Accessibility to transport modes	Whether the site has safe vehicular, pedestrian and/or cycle access to the site. Whether the site can be accessed by public transport. Whether the site has good access to the primary highway network.
Relationship with settled communities	Whether the site, if developed for traveller use, would impact on the amenity of nearby residents by impacting on surrounding settlements or affecting local character or visual appearance.



- 6.11 The assessments of the sites were undertaken based on information gained from site submission forms, site visits, desktop assessments and, where applicable, information submitted as part of a planning application. In addition, information on sites was also gained following discussions with colleagues in Planning Enforcement, Development Management and Environmental Health. **Should more information come from these or other sources, the conclusions in the assessments may alter in future reviews.**

#### Assessing the suitability of sites

- 6.12 When assessing the suitability of sites, consideration was given to the aspects covered in the template above. For example, if a site was predominantly in an area of high flood risk (i.e. Flood Zone 3) then it would be assessed as being unsuitable.
- 6.13 In the above example, the conclusion reached would be the same if the site was assessed for housing. However, in some circumstances it was necessary to assess sites differently due to the nature of Traveller sites provision. For instance, a site would not be seen as unsuitable from a location perspective if it were not connected to an existing sustainable settlement as it is generally accepted that travellers reside in relatively remote locations. Further, the AONB designation does not automatically restrict development of sites for Traveller uses as the relatively minor level of development is likely to have a lesser effect than housing development.
- 6.14 As with the assessment of potential housing sites in this HELAA potential traveller sites that are located in the Green Belt are not instantly ruled out on that basis. Indeed it is recognised that all of the sites under consideration for traveller uses are located in the Green Belt, which is not surprising given the characteristic of the district and the nature of traveller sites.
- 6.15 Policy E of the PPTS explains that where exceptional circumstances can be demonstrated, sites for traveller use can be allocated by altering the Green Belt boundaries through the plan-making process to meet identified needs. Therefore should the Council wish to allocate traveller sites in the Local Plan, it would have to prove that exceptional circumstances exist.
- 6.16 Whether exceptional circumstances exist to justify Green Belt release for traveller sites is not a consideration for the HELAA. As such, while the location of sites within the Green Belt is recognised, no potential traveller site has been ruled out on Green Belt grounds.

#### Assessing the availability of sites

- 6.17 As the sites have been submitted to the Council by or on behalf of landowners or are subject to a live planning application, it is assumed that all of the sites are available.

6.18 Since the 2015 HELAA was published, the Council received confirmation that land ownership of BLE 012 had changed and consequently much of the site was not available for consideration. As a result, the site was redrawn to reflect the extent of the site available for consideration.

#### Assessing the achievability of sites

6.19 Consideration was given to the general achievability of sites as part of the assessment and any obvious constraints that could prevent a site from coming forward were noted. The potential financial implications of mitigating constraints were not looked at in detail at this time and comprehensive viability testing will be undertaken on sites which are to be considered for allocation through the Local Plan.

#### Estimating Site Capacity

6.20 For the assessments, we have assumed a development density of 15 pitches per hectare, unless a different and realistic figure has been identified by those submitting the site. The sites have been assessed for being suitable for either Gypsy and Traveller pitches or Travelling Showpeople plots, depending on what was indicated by the landowner/agent.

6.21 On a number of the sites, mobile homes and pitches are already in existence. In such cases, the assessments have noted therefore both the gross and net amount of pitches that could be delivered.

### Site Categorisation

6.22 The sites have been assessed to be in one of the three following categories:

1. Sites that are suitable – Those sites that are considered to be suitable for allocation and it is believed that any issues can be overcome.
2. Sites with issues to overcome – Those sites that have an issue(s) and it is not known at this point whether such issues can be addressed.
3. Sites that are not suitable – Those sites where an issue or issues prevent the site from being considered as suitable and are not capable of being overcome.

6.23 The assessments for each site can be found in Appendix 7. A summary of the findings are presented in Table 3, below.

**Table 3: Overall findings of the assessment of Traveller Sites**

Overall			
Category	Suitable	Issues to overcome	Not suitable
Yield	4 sites – 35 pitches (28 net)	9 sites – 41 (37 net) pitches	4 sites – 19 (15 net) pitches & 17 plots.

## Future Updates

- 6.24 As the HELAA is an iterative process, any future reviews will look at additional information available for the Council to consider. This will include additional sites submitted to the Council for traveller provision and consideration of potential pitch/plot yields based upon liaison with landowners and site promoters.
- 6.25 Although the HELAA is published alongside other evidence base studies which collectively inform the Local Plan: Sites Consultation document, at the time of writing and compiling the HELAA, such studies had not been completed. As a result, the HELAA **does not** reflect studies, including the Green Belt Assessment (Part 2): Areas of Further Investigation, nor the Landscape Capacity and Sensitivity Study and Site based Ecology Assessments.
- 6.26 Given that such additional information may be considered by the Council, **conclusions on the suitability, availability and achievability of sites can change.**
- 6.27 The PPTS states in Paragraph 10, Policy B that “authorities should, in producing their Local Plan:
- a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against their locally set targets
  - b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15.”
- 6.28 In accordance with the above policy in the PPTS, once locally set pitch and plot targets have been identified, future updates of this section of the HELAA will identify deliverable and developable sites. The Council may also have to consider other opportunities to encourage land to be submitted that could be assessed for traveller provision.

## 7. Windfall Calculation

### Background

- 7.1 The NPPF's glossary identifies windfall sites as "sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available."
- 7.2 Paragraph 48 of the NPPF states that Local Planning Authorities may make an allowance for windfall sites in the five-year supply based on the following criteria:
1. They have compelling evidence that such sites have consistently become available in the local area; and
  2. These sites will continue to provide a reliable source of supply.
- 7.3 An allowance for windfall development may also be made in Local Plans to assist Local Authorities in meeting their identified housing target. If doing so, the NPPF and PPG is clear that any allowance should have regard to the Strategic Housing Land Availability Assessment (called the HELAA by Tandridge District Council), historic windfall delivery rates and expected future trends. In addition, it is clear that development on residential garden land should not be considered as windfall<sup>9</sup>.

### Approach

- 7.4 The Council's view is that the delivery of unidentified small sites in the district has been and will continue to be an integral source of housing supply, and therefore the HELAA should include an estimation of future housing delivery through windfall sites. This would allow the Council to consider making an allowance for windfall development in the emerging Local Plan.
- 7.5 The Council proposes to only include a windfall allowance for sites capable of accommodating less than 5 net dwellings. Sites capable of providing 5 units or more should be identified through the HELAA process and as such, will not be counted as windfall as it would effectively result in sites being double counted.

### Historic Windfall Delivery

- 7.6 In order to estimate a windfall delivery figure, the Council looked at the average net completions on residential developments of less than 5 dwellings

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<sup>9</sup> Historically, a significant contribution to the housing supply has come from residential garden land; however the Government has explicitly excluded this element from windfall calculations (NPPF para. 48). This is unfortunate given the significance of this element in Tandridge. However the Council is bound by national policy.

between the 2006/2007 and 2015/2016 monitoring periods. The figures are presented in Table 4.

- 7.7 While historic windfall calculations in Tandridge have included those coming forward on residential garden land, the NPPF states that such land should not be included in such calculations. As such, we have filtered garden land development out of the windfall completion figures. This is shown in Table 4, below.

**Table 4: Table showing small site windfall completions between 2006 and 2016**

Year	Total Small Site Windfall Completions	Total Small Site Windfall Completions on Residential Garden Land	Total Small Site Windfall Completions Excluding Residential Garden Land
2006/2007	53	19	34
2007/2008	51	26	25
2008/2009	40	17	23
2009/2010	46	21	25
2010/2011	37	16	21
2011/2012	39	12	27
2012/2013	64	31	33
2013/2014	82	41	41
2014/2015	38	20	18
2015/2016	66	33	33
<b>Average</b>	51.6	23.6	<b>28.0</b>

- 7.8 As presented in Table 4 above, the average windfall delivery on site of 4 homes or less between 2006/2007 and 2015/2016 was approximately **52** dwellings per year. When residential garden land is excluded from such figures, the delivery rate is **28** dwellings per year.

### Future Trends

- 7.9 When estimating a windfall allowance, the NPPF states the consideration should be given to future trends as well as to long-term historic delivery rates.
- 7.10 There are a number of factors to consider when estimating future trends. Firstly, figures from the Department for Communities and Local Government (DCLG) indicate that house building commencements and completions were

higher in 2015 than in the previous year. This may point to an improvement in the housing market at a national level that may result in a higher future windfall delivery rate in the district.

- 7.11 The idea of a market upturn is further supported by an increase in the number of completions on small sites in Tandridge over the past 4 years, compared to the rate in the previous 4 year period. This may have been aided by changes to the planning system, including permitted development rights changes that allow offices to be converted for residential uses without the need for planning permission.
- 7.12 Though it is possible that small site windfall delivery rates could rise, it is seen as more realistic to project forward the historic small site windfall figures<sup>10</sup>. This is partly because while permitted development changes may aid the delivery of housing, it is unlikely to do so on small sites at a noticeable rate due to the relative scarcity of such sites in the district. Furthermore, due to the delivery of previous windfall development, the amount of sites available for windfall development on small sites will be more limited and thus an increase of housing on such sites is seen as being unlikely.
- 7.13 Additionally, though the market conditions have improved in recent years, there is no guarantee that such conditions will continue in the long-term and it is possible that events, such as the decision to leave the European Union, will have an impact upon the housing market. As the historic windfall delivery rates were taken over a long period containing market growth, decline and recovery, it is therefore likely to be reflective of long-term market conditions.

### Estimating a Windfall Allowance

- 7.14 The Council has considered that it would not be appropriate to have a windfall allowance of approximately 52 homes per year, which reflects long-term small site windfall delivery since 2006/2007. Due to changes in national policy, it is instead seen as more appropriate to use a figure that excludes residential garden land development. On average since 2006/2007, 28 dwellings per year have come forward as part of small site windfall development on non-residential garden land.
- 7.15 The Council has considered future trends when estimating a windfall allowance but, on balance, feel it is more appropriate to use the historic delivery rates. **As such, the Council considers that its windfall allowance should be 28 dwellings per year.**

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<sup>10</sup> Minus those homes delivered on residential garden land.

## Future Updates

- 7.16 The Council will update this section on an annual basis as part of the HELAA review process and will recalculate its figure based on new small site windfall completions and market assumptions.

## 8. Notional Housing Trajectory

### Background

- 8.1 An important aspect of the HELAA is to use the results of the site assessments to produce a notional housing trajectory up to 2033, the end of the plan period for the Local Plan currently under preparation.
- 8.2 As well as utilising the results of the site assessments, the notional housing trajectory also includes existing housing land supply data, completions from between April 2013 and March 2015, as well as a windfall development allowance. **It should be understood that the trajectory is based on general assumptions and is used for indicative purposes.**

### Assumptions Used

- 8.3 It is not the purpose of the HELAA to suggest which sites should come forward for development or to allocate sites. It will be the Local Plan which ultimately makes such decisions. Instead, the HELAA identifies sites that could accommodate development and sets out whether sites are considered to be deliverable, developable or non-developable.
- 8.4 As the decision of which sites will be allocated is yet to be made, the trajectory includes all sites that have been assessed as being deliverable and developable in the HELAA.
- 8.5 Although this Report is due for publication in late October 2016, in order to match with monitoring data<sup>11</sup>, it utilises information on completions and planning permissions for the monitoring period ending the end of March 2016. The trajectory is based on a number of other general assumptions with regards to completion dates, build out rates and use of a windfall allowance. These issues are explained below.

### Completion Dates

- 8.6 The trajectory assumes that completions would commence on sites identified as being deliverable in 2017/2018 monitoring year. This is because the existing development plan would generally support development at such locations.
- 8.7 The trajectory also assumes that completions on sites assessed as being developable would begin in the 2021/2022 monitoring year. This is as the Local Plan is not envisaged to come into effect until 2019<sup>12</sup> and that gaining

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<sup>11</sup> <http://www.tandridge.gov.uk/Planning/PlanningPolicy/monitoring.htm>

<sup>12</sup> [www.tandridge.gov.uk/Tandridge%20District%20Council/Local%20Plan/160629LDS2016postCommitteeversionFINAL.pdf](http://www.tandridge.gov.uk/Tandridge%20District%20Council/Local%20Plan/160629LDS2016postCommitteeversionFINAL.pdf)



planning permission and developing sites could take a significant time after such sites may be allocated in the adopted Local Plan.

### Build Out Rates

- 8.8 The trajectory has taken a pragmatic approach and made an assumption on build out rates which are largely dependent on the amount of dwellings that the development of a site could yield, with larger sites generally having a higher build out rate. Such assumptions have been refined since the 2015 HELAA based on additional information provided by those who submitted HELAA sites.
- 8.9 The assumptions used are as follows:
- A site accommodating up to 20 dwellings would take a year to be built out;
  - A site accommodating between 21 and 60 dwellings would take 2 years to build out;
  - A site accommodating between 61 and 99 dwellings would take 3 years to build out;
  - A site accommodating between 100 and 399 dwellings would be built out a rate of 65 dwellings per year (assumes a single developer);
  - A site accommodating between 400 and 999 dwellings would be built out at a rate of 130 dwellings per year (assumes 2 developers); and
  - A site accommodating 1000 or more dwellings would be built out a rate of 200 dwellings per year (assumes 3 developers).
- 8.10 It is recognised that in the first year that completions are projected to come forward, the build rate may be slower as development may have only occurred for part of that year. Accordingly we have assumed that in the first year where completions are projected, the maximum build out rates would be the following:
- Up to 20 units on sites that could yield up to 60 dwellings;
  - Up to 25 units on sites between 61 and 99 dwellings; and
  - Up to 30 units per developer on sites that would yield 100 or more dwellings.

### Windfall Allowance

- 8.11 Section 6 of this report highlights that a windfall allowance on non-residential garden land could be applied at a rate of 28 dwellings per year. In order to avoid double counting of sites already within our five year housing land supply, we have applied the windfall allowance in the trajectory from the 2019/2020 monitoring year onwards.

### **Notional Housing Trajectory**

- 8.12 As well as including estimated site yields from the HELAA sites and an allowance for windfall delivery, the trajectory also includes all completions

from between the 2013/2014 and 2015/16 monitoring periods and the existing housing land supply comprising of sites with planning permission that the Council's identify in the latest Housing Land Supply Statement<sup>13</sup>.

- 8.13 The trajectory has taken into account the above factors into account and is presented in Table 5, below.

**Table 5: A table that presents the Council's notional housing trajectory**

Housing Delivery Type	Delivery Period			
	April 2013 – March 2016	April 2016 - March 2021 (Deliverable)	April 2021 - March 2026 (Developable)	April 2026 – March 2033 (Developable)
<b>Completions</b>	715	0	0	0
<b>Permissions</b>	0	1241	0	0
<b>Windfall allowance</b>	0	56	140	196
<b>Deliverable HELAA sites</b>	0	479	0	0
<b>Developable HELAA sites</b>	0	0	11137	2140
<b>Totals</b>	<b>715</b>	<b>1776</b>	<b>11277</b>	<b>2336</b>
<b>Cumulative</b>	<b>16104</b>			

### Future Updates

- 8.14 This section will be revised when the HELAA is next updated to take into account the latest information on the various inputs that inform the notional housing trajectory, such as the completions, current planning permissions and windfall allowance. It will also be revised to reflect additional information received by the Council in relation to site suitability, build out rates and yields.

<sup>13</sup> <http://www.tandridge.gov.uk/Planning/PlanningPolicy/monitoring.htm>

## 9. Findings and Next Steps

### Introduction

9.1 This section of the report summarises the main findings of the Housing and Economic Land Availability Assessment (HELAA) and indicates how the findings will be used to inform the development of the Local Plan.

### Potential Housing Sites

9.2 **15** sites were considered to be deliverable, meaning that they could come forward in the next 5 years. Collectively these sites are estimated to be able to deliver 479 dwellings.

9.3 **89** sites were considered to be developable, meaning that they could come forward in 5 or more years' time, between 2021 and 2033. Collectively, these sites are estimated to be able to deliver **13,277**. This figure excludes estimated windfall figures and only includes sites identified in the HELAA. As with the deliverable sites, maps and site assessment information for sites considered to be developable can be found in Appendix 3.

### Potential Employment Sites

9.4 The Economic Needs Assessment (ENA) identified that there was likely to be little need for additional employment needs through the plan period but that existing sites should be retained and/or intensified for increased use.

9.5 Based on responses received by the Council to a survey, it is considered that there are **11** sites that are considered to be available to be expanded or intensified which could yield an additional amount of employment floorspace.

### Potential Traveller Sites

9.6 **4** sites were considered suitable for traveller accommodation. Collectively, such sites could deliver up to **35** (28 net) pitches should they come forward through the Local Plan process.

9.7 **9** sites were identified as having issues that would need to be overcome before they could be considered suitable for traveller accommodation. Collectively, it is thought that such sites could deliver up to **41** (37 net) pitches should the issues be overcome.

### Windfall Housing Delivery

9.8 The Council has estimated that it could make an allowance for **28** dwellings per year coming forward on small<sup>14</sup> windfall sites. Such an allowance is considered appropriate given the strong history of housing delivery on such sites in Tandridge.

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<sup>14</sup> Sites that deliver between 1 and 4 net dwellings and are not built on residential garden land.

## Notional Housing Trajectory

- 9.9 Using the information collected on sites assessed as being deliverable and developable for housing, the Council has produced a notional housing trajectory for the period 2013-2033. **For the purposes of the trajectory only**, the Council has assumed that all sites assessed as being deliverable would come forward from the 2017/2018 monitoring period and all developable sites would come forward from 2021/2022.
- 9.10 When deliverable and developable sites were added to figures for housing completions, sites with planning permissions and an allowance for windfall delivery, the Council was able to identify the following notional trajectory, shown in Table 6, below.

**Table 6: The Notional Housing Trajectory**

Housing Delivery Type	Delivery Period			
	April 2013 – March 2016	April 2016 - March 2021 (Deliverable)	April 2021 - March 2026 (Developable)	April 2026 – March 2033 (Developable)
<b>Completions</b>	715	0	0	0
<b>Permissions</b>	0	1241	0	0
<b>Windfall allowance</b>	0	56	140	196
<b>Deliverable HELAA sites</b>	0	479	0	0
<b>Developable HELAA sites</b>	0	0	11137	2140
<b>Totals</b>	<b>715</b>	<b>1776</b>	<b>11277</b>	<b>2336</b>
<b>Cumulative</b>	<b>16104</b>			

- 9.11 The Council note that the cumulative total above significantly exceeds that of the identified housing need set out in the Strategic Housing Market Assessment of 9,400 units, up to 2033. However, as set out throughout this document, the HELAA considers the development potential of a site only and as set out in the PPG<sup>15</sup> should not be constrained by the need for development, but instead provide an audit of land which can inform the Local Plan. Therefore, it is therefore not constrained by an upper limit in terms of the number of sites it can assess.
- 9.12 Further the HELAA, has no remit to allocate sites, nor does it recommend the allocation of sites or assume that any planning application on a site should be approved.

<sup>15</sup> Planning Practice Guidance Paragraph: 009 Reference ID: 3-009-20140306

- 9.13 The Local Plan will be the document which determines the local housing delivery target to be set, as well as the locations of development, in accordance with a number of other evidence based documents, all of which will inform the content and development strategy to be pursued. Once the development strategy for the Local Plan is known and it is clear where the Council will seek to focus development, sites which are not in those locations may become unsuitable and unavailable, thus impacting upon the cumulative figure. The parameters used to assess sites through the HELAA will be fundamentally influenced by the development strategy put forward in the Local Plan, as well as by other evidence base documents. This demonstrates the need to initially consider sites that will result in a potential figure which is over and above our identified housing need, due to the likelihood of some sites being determined as unsuitable or unavailable through the iterative process.

### How the Findings will be used

- 9.14 The findings of the HELAA will be used, alongside other evidence base documents, to inform the production of the Local Plan by helping to identify development options for consideration by the Council.
- 9.15 **It is important to remember that the HELAA is not a statement of policy and classifying of a site as being suitable, available and achievable does not grant a site planning permission and is not an allocation. The Council can only allocate land for development in its Local Plan.**

### Future Updates

- 9.16 Although the HELAA is published alongside other evidence base studies which collectively inform the Local Plan: Sites Consultation document, at the time of writing and compiling the HELAA, such studies had not been completed. As a result, the HELAA **does not** reflect studies, including the Green Belt Assessment (Part 2): Areas of Further Investigation, nor the Landscape Capacity and Sensitivity Study and Site based Ecology Assessments.
- 9.17 The HELAA is a process that is to be repeated on a regular basis in order to inform future stages of the Local Plan. As such this HELAA report will be revised to take into account additional information available to the Council. It will reassess sites based on this additional information and will assess any further sites submitted to the Council. As a result, conclusions reached on sites may change.
- 9.18 The estimated windfall delivery rate will also be recalculated to include recent completions and a reassessment of market conditions, when the HELAA is next updated.

## Submitting new sites for assessment

- 9.19 As stipulated in this document, the HELAA is an iterative process and developers, planning agents and landowners continue to be able to submit sites to be assessed through the HELAA for different land uses.
- 9.20 Any new sites to be submitted should be accompanied by a completed site proforma, available on the Council's [website](#)<sup>16</sup>, and a red edged map which clearly indicates the location of the site and the exact boundary.
- 9.21 In accordance with the Council's HELAA methodology, a deadline for submission of further sites has been set to ensure that the assessment process can be completed in a timely fashion and to feed into other evidence based processes, the deadline for submissions is **30 December 2016**.
- 9.22 Sites received on, or before, this date will be assessed in the 2017 update and subsequently be available for consideration in the preparation of the Council's preferred strategy for the emerging Local Plan. A list of sites which have already been submitted for consideration in the 2017 HELAA process and which have yet to be assessed in any capacity is included at Appendix 8. Sites received after the deadline date will remain a consideration for subsequent HELAA updates, but the Council cannot guarantee that they will be a consideration in arriving at the preferred strategy for the Local Plan due to the timetable for plan preparation.

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<http://www.tandridge.gov.uk/Planning/planningpolicy/evidence/strategichousinglandavailabilityassessment.htm>